



DEPARTMENT OF LAW
CITY OF CHICAGO

April 21, 2017

H. Candace Gorman
Law Office of H. Candace Gorman
220 South Halsted Street
Suite 200
Chicago, Illinois 60661

Matthias D. Gill
The Gill Law Firm, PC
1820 Ridge Road, Suite 216
Homewood, IL 60430

VIA: Electronic Transmission and U.S. Mail

RE: *Young v. City of Chicago et al.*, 13 C 5651

Counsel:

Pursuant to our 3/2 discussions on the City's Responses to Plaintiff's Third Set of Interrogatories, namely Interrogatories 8 and 9, we have looked into the matter and have the following responses.

In regard to Interrogatory No. 9, upon review over the last week, including a review of the regular-accepted definitions of the word "Liaison," we will stand on our objections and response to Interrogatory No. 9.

In regard to Interrogatory No. 8, upon review over this last week, we supplement our response as follows, and you may serve deposition notices for these individuals on the City attorneys should you wish to depose them on their work in the scope of their employment with the City. The only two former employees that you may contact directly are the non-supervisors Margarita Galindo and Dewi Klava. Contact with the Corporation Counsel regarding their consent to be

Letter to Candace Gorman and Matthias Gill, in *Young v. City of Chicago, et al.*, 13 C 5651, dated April 21, 2017, P.2.

represented by this office is still pending for those two former employees. If they are unable to be contacted, or otherwise do not consent to representation by the Corporation Counsel, their last known address will be forwarded to Plaintiff.

<u>Name</u>	<u>Title</u>	<u>If Non-Supervisor, Employment Status with City</u>
George Roberts	Supervising Investigator	
Andrea Stoughtenborough	Coordinator of Investigations	
Margarita Gallindo	Investigator	Left City**
Steve Hirsch	First Deputy	
Daniel Kobel	Investigator	Current Employee
Roberto Soto	Investigator	Current Employee
Artra Thomas	Investigator	Current Employee
William Abbruzzese	Investigator	Left City*
Larry Merritt	Director of Community Outreach	
Claudia Silva	Staff Attorney	Current Employee
Nina Corley	Investigator	Left City*
Heather Looby	Investigator	Left City*
Alexis Serio	Supervising Investigator	
Eric Mullenbach	General Counsel	
Dewi Klava	Paralegal	Left City**
Scott Ando	Chief Administrator	

* Non-Supervisor Consented to Corporation Counsel's representation in this matter, to be contacted through City's attorney

** Contact with Corporation Counsel pending.

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<u>Name</u>	<u>Title</u>	<u>If Non-Supervisor, Employment Status with City (Cont'd.)</u>
Patrick Querfurth	Supervising Investigator	
Mark Hitt	Supervising Investigator	

Sincerely,

/s/ Jonathan Clark Green
Jonathan Clark Green
Senior Counsel
City of Chicago Department of Law
30 N. LaSalle Street, Suite 900
Chicago, IL 60602
(312) 744-0226

cc (via electronic transmission):

Naomi Avendano and Raoul Mowatt for the City
Matt Hurd and Caroline Fronczak for the Individual Defendants
Patrick Rocks for Respondent IPRA